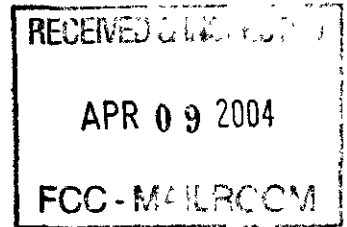


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Comments on RM-10867

Submitted to: Federal Communications Commission
445 12th Street SW
Washington, DC 20554



I have reviewed RM-10867 and fully support its adoption. While there are several proposals being floated that have various aspects in common, this one submitted by the American Radio Relay League (ARRL) appears to be the most well thought-out long-term approach. I especially support the consolidation of the Advanced Class license with the Amateur Extra Class, the Technician Class and the General Class, and the reallocation of sub-bands as proposed. I do, however, disagree with the idea of removing the Morse code requirement from the General Class license. While I am often critical of the ARRL, this time they are on-target.

1. Consolidation of the Advanced Class license with the Amateur Extra is appropriate because (1) both licenses reflect similar levels of skill and (2) it will simply and make more efficient the administration of the entire licensing structure. Absolutely no license class should lose privileges. The slight gain in privileges by the Advanced Class is warranted, again, because the levels of technology associated with the classes are similar and the trade-off to simplify and administratively streamline the class structure is more than worth the move. The merging of the Advanced Class license without further testing absolutely should happen.
2. Consolidation of the Technician/Technician Plus classes with the General license class should also occur due to similar reasons. These consolidations should be viewed as a minor "course correction" rather than a major change.
3. The reallocation of the sub-bands as proposed in the ARRL's petition is appropriate. With the de-emphasis on Morse code, reallocation of the available bandwidth for other modes, especially SSB, should be adopted. The proposed reallocation of the sub-bands represents a more efficient use of the available frequencies by the vast majority of amateur radio operators. The ARRL is wise, too, in not recommending any change to the 20 meter ham band.
4. Finally, I oppose removing any Morse code requirement from the General Class requirements. Code can be the most reliable mode of communications, and should be supported. Moreover, if there are sub-bands allocated for CW, a minimal code requirement (5 wpm) is appropriate. Otherwise, why have a code band for the General Class?

I recommend adoption of this petition as soon as possible. Consolidation of the Advanced and Amateur Extra Classes, consolidation of the Technician/Technician Plus and General Classes, reallocation or adjustment of the sub-bands is appropriate, and retaining minimal code proficiency on the General Class are all in the best interest of the

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amateur community and the FCC. I strongly encourage the Commission to adopt the proposed licensing changes proposed by the ARRL.

APR 09 2004

Respectfully submitted by:

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March 30, 2004